



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 31, 2021

BY ECF

Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Hamid Akhavan et al.*, S3 20 Cr. 188 (JSR)

Dear Judge Rakoff:

The Government respectfully submits this letter to address the recent letter request (Dkt. 248) from an investigative journalist concerning access to exhibits that were admitted in the trial in the above-captioned case, and information concerning a cooperating witness who testified at that trial. As to access to the trial exhibits, consistent with the Court's prior ruling, the parties have made the trial exhibits available to the press through a file-sharing platform, and the investigative journalist can gain access to the exhibits by contacting Nicholas Biase at Nicholas.Biase@usdoj.gov.

In addition, as to the journalist's inquiry regarding cooperating witness Oliver Hargreaves, the Government has requested that his case, *United States v. Oliver Hargreaves*, 18 Cr. 746 (KPF), be unsealed. Once the case is unsealed, the journalist will be able to access all of the publicly available documents through PACER.

Very truly yours,

AUDREY STRAUSS
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cc: all counsel of record (by ECF)